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14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **SAN JOSE DIVISION**

17 APPLIED MATERIALS, INC.,

18 Plaintiff,

19 vs.

20 DEMARAY LLC,

21 Defendant.
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Case No. 5:20-cv-09341-EJD

**DECLARATION OF C. MACLAIN
WELLS IN SUPPORT OF DEMARAY
LLC'S RESPONSIVE CLAIM
CONSTRUCTION BRIEF**

DECLARATION OF C. MACLAIN WELLS

I, C. Maclain Wells, hereby declare as follows:

1. I am an attorney at the law firm of Folio Law Group PLLC, counsel for Defendant Demaray LLC ("Demaray"). I am a member in good standing of the State Bar of California and have been duly licensed to practice law before all of the courts of the State of California. I submit this declaration in support of Demaray's responsive claim constructive brief. I have personal knowledge of the matters set forth in this declaration and, if called as a witness, could testify to its contents.

2. Attached as **Exhibit A** is a copy of U.S. Patent No. 7,381,657 ("the '657 Patent").

3. Attached as **Exhibit B** is a copy of U.S. Patent No. 7,544,276 ("the '276 Patent").

4. Attached as **Exhibit C** is a copy of the August 17, 2021 Claim Construction Order entered in *Demaray LLC v. Intel Corp.*, Case No. 6:20-cv-00634-ADA (W.D. Tex.), and in *Demaray LLC v. Samsung Electronics Co., Ltd. et al.*, Case No. 6:20-cv-00636-ADA (W.D. Tex.).

5. Attached as **Exhibit D** is a copy of the February 27, 2022 Claim Construction Order entered in *Demaray LLC v. Intel Corp.*, Case No. 6:20-cv-00634-ADA (W.D. Tex.), and in *Demaray LLC v. Samsung Electronics Co., Ltd. et al.*, Case No. 6:20-cv-00636-ADA (W.D. Tex.).

6. Attached as **Exhibit E** is Intel and Samsung's Responsive Claim Construction Brief in *Demaray LLC v. Intel Corp.*, Case No. 6:20-cv-00634-ADA (W.D. Tex.), Dkt. 58; and *Demaray LLC v. Samsung Electronics Co., Ltd. et al.*, Case No. 6:20-cv-00636-ADA (W.D. Tex.), Dkt. 62.

7. Attached as **Exhibit F** is a copy of U.S. Patent No. 6,350,353. The document is cited on the face of the '657 and '276 Patents.

8. Attached as **Exhibit G** is a copy of a white paper by Scholl, titled "Power supplies for pulsed plasma technologies: State-of-the-art and outlook." The document is cited on the face of the '657 and '276 Patents, and was produced in the Western District of Texas cases, at DEFTS-PA_002936.

9. Attached hereto as **Exhibit H** is a copy of Advanced Energy Industries, Inc.'s Pinnacle Plus+ 10 kW (325-650 Vdc) Master/Slave AE Bus, DeviceNet, MDXL User, UHF Output User

1 Manual (June 2002), which was filed in *Demaray LLC v. Intel Corp.*, Case No. 6:20-cv-00634-
2 ADA (W.D. Tex.) at Docket 61-9.

3 10. Attached as **Exhibit I** is an excerpt from the Modern Dictionary of Electronics (7th
4 ed.), which Demaray produced in *Demaray LLC v. Intel Corp.*, Case No. 6:20-cv-00634-ADA
5 (W.D. Tex.) at DEMINT00003506.

6 11. Attached as **Exhibit J** is a copy of a white paper by Scholl, titled "Power Systems
7 for Reactive Sputtering of Insulating Films." The document is cited on the face of the '657 and
8 '276 Patents, and was produced in the Western District of Texas cases at DEFTS-PA_003056.

9 12. Attached as **Exhibit K** is the Declaration of Dr. Alexander D. Glew in Support of
10 Demaray's Claim Construction brief, which has been served on Applied.

11 13. I represented Demaray as its counsel in responding to all four of Applied's inter
12 partes review petitions. As such, I am familiar with Applied's petitions and other filings in these
13 matters. In IPR2021-00103, IPR2021-00104, IPR2021-00105, and IPR2021-00106, Applied did
14 not seek construction of "narrow band rejection filter, "pulsed DC power" or "pulsed DC power
15 supply, "a method of depositing an insulating film on a substrate, comprising," "the insulating
16 film," or "insulating substrate."

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18 Executed on April 1, 2022 in San Francisco, California. I declare under penalty of perjury
19 that the foregoing is true and correct.

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21 By: /s/ C. Maclain Wells

C. Maclain Wells

Attorneys for Defendant DEMARAY LLC

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